

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268

In the Matter of:

Meridian Post Office, New York      13113      :      Docket No: A 2011-66  
Post Office      State      ZIP Code

Beth Dishaw,      Petitioner(s)      :

PARTICIPANT STATEMENT

1. Petitioner(s) are appealing the Postal Service's Final Determination concerning the Meridian, NY post office. The Final Determination was posted August 24, 2011.

2. In accordance with applicable law, 39 U.S.C. § 404(d)(5), the Petitioner(s) request the Postal Regulatory Commission to review the Postal Service's determination on the basis of the record before the Postal Service in the making of the determination.

3. Petitioners: Please set out below the reasons why you believe the Postal Service's Final Determination should be reversed and returned to the Postal Service for further consideration. (See pages of the Instructions for an outline of the kinds of reasons the law requires us to consider.) Please be as specific as possible. Please continue on additional paper if you need more space and attach the additional page(s) to this form.

We believe that the Postal Service's final determination to close the Meridian Post Office was arbitrary and capricious. The Postal Service stated that this review of the Meridian Post Office was triggered by the retirement of our Postmaster, an arbitrary event, not by the relative profitability of the Meridian Post Office in comparison to other, similar postal operations in our area. Despite the fact that the Meridian Post Office currently generates approximately \$25,000 profit in revenues above expenses annually (as stated in the Postal Services Final Determination, revenues cited under RESPONSIVENESS TO COMMUNITY POSTAL NEEDS, less costs cited under ECONOMIC SAVINGS), our post office is slated to be closed. The primary reason given for closure by the Postal Service was cost savings and more efficient service, yet other small unprofitable post offices in our area are not being considered. This determination is arbitrary.

A much greater savings would be achieved by the Postal Service if unprofitable operations were reviewed, instead of the arbitrary review of post offices without a postmaster. While it should not be the only factor, profitability should weigh positively in determinations of closure. The Meridian Post Office is profitable because it is easy to use: there is sufficient parking, service is quick and excellent and it is conveniently located on a major route for commuters. One small business, Komac Industries, uses the Meridian Post Office daily to mail packages. Our post office is located conveniently between the owner's home in Fulton and his work in Auburn. Several teachers at the Cato-Meridian School use our post office for a transacting business and even renting boxes because it is more convenient than their local post office. It is unlikely that they will take their business to Cato because it is located in the

wrong direction from their normal commute. An ambulance billing service from Baldwinsville also uses our post office because an employee passes this way and it is more convenient than the busy Baldwinsville Post Office.

The Postal Service is making the assumption that Meridian's current customers will simply move their business to another post office, without showing the factual basis for this assumption. Since the Postal Service is proposing to close many Post Offices across the country, has it entered into any factual and objective studies of the actual effect of closing convenient post offices on postal sales and revenue? No such study was cited in their Final Determination to close our post office. We do not believe that the Postal Service has established substantial and factual evidence that this closing will actually save the Postal Service money, their stated goal. We believe that no cost savings will be realized since some customers have stated that they will simply move their business to other providers such as UPS or FedEx or utilize internet services that bypass the Postal Service all together. One large customer of the Meridian Post Office, who sells items on eBay generates postal sales in excess of \$9000. He states that it is even more convenient for him than route carrier pickup since he is not home most of the day. He stated that he will simply move to another carrier like United Parcel Service if he doesn't have the convenience of the Meridian Post Office.

We believe that the current customers of the Meridian Post Office will not be provided with a maximum, let alone an acceptable degree of effective postal services by converting our mail service to rural delivery from the Cato, NY post office. We are a small rural community with many senior citizens, who by and large, can currently walk to the post office. We rely on the Post Office. Residents have an opportunity to get postal services, such as money orders, special types of mail, package delivery and receipt, and stamps without driving or only driving very short distances. This is particularly an issue for seniors. There are no other stores or retail businesses in the village except a tavern and a seasonal ice cream stand. The Postal Service argues that rural delivery customers can access all postal services through their rural delivery carriers. However, common sense and experience would lead one to conclude that this is not an effective, reasonable or practical way to receive services.

For example, as outlined in the Postal Service's Final Determination, to purchase a money order from a rural carrier would require a customer to go through multiple steps and wait at least a day (or more if the next day wasn't a business day) to actually receive it. They would have to wait by the road to meet the carrier at the box, complete an application, give the money to the carrier, get a receipt for the money from the carrier and then wait until the next business day to actually receive the money order. Alternately, they could leave the money in the rural delivery mailbox unattended, hoping that it would not be stolen. Who would leave considerable amounts of money unattended in a rural delivery mailbox located in a village with pedestrians passing by? How does a customer know exactly when the carrier is coming? If the carrier were asked to signal their arrival by honking the horn, what activity might be interrupted? How long will a carrier wait for an elderly person to exit the house to meet them? What happens during the winter or in inclement weather? How is this maximum effective service for customers who work during the day when rural delivery is made? How do residents maintain access to mailboxes when snow banks in the village are 6 foot high and turned to ice? Similar difficulties would be experienced by customers trying to mail a package or send a letter by certified mail through rural carriers. Would this method work at all for an express mailing? Do you really believe the carriers can take on this additional responsibility? We are in a snow belt region and damage to boxes from plows is common. Not only aren't our elderly patrons unable to do a repair, it requires them to pay to get the repair done. Who will keep the box free of snow to allow the carrier to access the box?

It seems that there are many practical issues that have not been seriously considered much less addressed.

Currently it takes 5 minutes or less to purchase a money order at our Post Office. It can be verified immediately and mailed on the spot. The Postal Service also cites online services as an alternative to using our convenient post office. However, many residents are older and may not use computers or even have access to the internet or a computer. They may also be unable to drive or have only limited driving ability. Meridian residents can easily walk to the post office. The Meridian Post Office allows customers to do business when it is convenient for the customer, not just when it is convenient for the Postal Service. This is effective service. A good business model would focus on customer service. Again, has the Postal Service carried out any objective studies to determine if customers are well served by accessing services from the rural carrier? They have not established factually the effectiveness of this change in services. When Meridian customers voiced many valid objections at our public meeting that questioned the effectiveness of the change in service, we were given pat answers that have been repeated over and over by the Postal Service in Post Office closing notices across the country. Since the impact of these closings will result in sweeping service changes for postal customers nationally, the Postal Service needs to document through objective, third party studies that their answers have some basis in fact.

The most disturbing point to us is that our Post Office is generating revenue. Why would you arbitrarily close a profitable operation?

Closing the Meridian Post Office will result in the loss of employment opportunity in our area. These positions are significant in our small village and needed in this time of substantial unemployment. In rural communities such as ours, post offices serve as community centers where information can be accessed, as a meeting place and a source of identity for the community. Closing the Meridian Post Office, which has been in operation well over 100 years, will have a very negative impact on our small village and would not achieve the cost savings that the Postal Service has projected.

We respectfully request that the Postal Regulatory Commission return the matter of the closing of the Meridian Post Office to the United States Postal Service for further review.